



# Illinois Department of Insurance

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PAT QUINN  
Governor

ANDREW BORON  
Director

TO: ALL ACCIDENT AND HEALTH INSURERS, HEALTH MAINTENANCE ORGANIZATIONS, LIMITED HEALTH SERVICE ORGANIZATIONS, AND VOLUNTARY HEALTH SERVICE PLANS

FROM: ANDREW BORON, DIRECTOR 

DATE: May 20, 2014

RE: COMPANY BULLETIN #2014-07

FILING OF PLANS TO BE SOLD ONLY OFF OF THE ILLINOIS HEALTH MARKETPLACE FOR 2015 PLAN YEAR

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The Patient Protection and Affordable Care Act of 2010, as amended by the Health Care and Education Reconciliation Act of 2010 (the "ACA"), and its attendant regulations, require that individual and group health benefit plans issued after March 23, 2010 ("non-grandfathered plans") comply with market reforms of Title I, Subtitles C and D of the ACA. However, individual and small group plans that were sold before January 1, 2014 that will be renewed between January 1, 2015 and October 1, 2015 (referred to as "transitional renewal plans") will not be required to comply with market reforms. (See CB 2014-04).

Plans that will be offered for sale off of the Illinois Health Marketplace that are required to comply with the requirements of the ACA will be reviewed by the Department to confirm compliance with those requirements. In order for such off-Marketplace plans to be sold on or after November 15, 2014, for coverage beginning on January 1, 2015, issuers should transmit their rate and form filings through SERFF by September 15, 2014. Any off-Marketplace plans submitted after that date will not be reviewed and approved for sale by the Department before November 15, 2014. Such plans will accordingly not be able to utilize the open enrollment periods as defined in the ACA. The result will be that those plans must enroll any individual who applies during the plan year.

The ACA market reforms require non-grandfathered and non-transitional renewal plans to have essential health benefits, limited cost sharing, premium rates that are not discriminatory, guaranteed availability and renewability of coverage, and prohibit denial of coverage against individual participants and beneficiaries based on preexisting conditions, among other things.

If you have any questions, please contact Yvonne Clearwater at [Yvonne.clearwater@illinois.gov](mailto:Yvonne.clearwater@illinois.gov)

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